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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PARADISE ENTERTAINMENT
LIMITED, a Bermuda corporation; and
LT GAME, INC., a
Nevada corporation,

Plaintiffs,

v.

EMPIRE TECHNOLOGICAL GROUP
LIMITED, a Nevada corporation;
GAMING SPECIALIZED LOGISTICS
LLC, a Nevada limited liability company;
LINYI FENG, an individual; ROY
KELCEY ALLISON, an individual; and
DARYN KIELY, an individual,

Defendants.

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Case No. 2:24-cv-00428-JCM-BNW

**AGREED STIPULATION TO EXTEND
CASE DEADLINES**

[FIRST REQUEST]

STIPULATION

Case No. 2:24-cv-00428-JCM-BNW

1 Plaintiffs Paradise Entertainment Limited (“**Paradise**”) and LT Game, Inc. (“**LT Game**”)
 2 (collectively “**Plaintiffs**”) and Defendants Empire Technological Group Limited (“**Empire**”), Linyi
 3 (Frank) Feng, Roy Kelcey Allison, Gaming Specialized Logistics LLC (“**GSL**”), and Daryn Kiely
 4 (collectively, “**Defendants**”) by and through their undersigned counsel of record, hereby stipulate and
 5 agree to a 90-day extension of the case deadlines to allow the parties sufficient time to complete discovery,
 6 and sufficient time in which to try to resolve a complicated discovery dispute that has arisen which the
 7 parties are attempting to resolve without the need for court intervention. As part of their stipulation, the
 8 parties have also agreed to a conduct a mediation after sufficient discovery has been completed.

9 The Parties are making their request well in advance of the current February 28, 2025 fact
 10 discovery cut-off, and submit that there is good cause for the schedule extension, as discussed below.

11 **A. Background**

12 Plaintiffs filed their Complaint earlier this year on March 1, 2024 alleging that, since
 13 approximately 2017, Defendants have been engaged in misconduct including fraud, breach of fiduciary
 14 duties, trade secret misappropriation, copyright infringement, and breach of contract, among other claims.
 15 (ECF No. 1.) Defendants deny Plaintiffs’ allegations and maintain that they are not liable for the alleged
 16 misconduct and have asserted counterclaims against Plaintiffs. Since then, the Parties have conducted
 17 significant written discovery and produced a voluminous amount of documents.

18 **B. Statement Specifying the Discovery Completed and What Remains**

19 Since then, the Parties have diligently conducted significant, expansive, and voluminous
 20 discovery, which has included:

- 21 • Review of several hundred thousand documents – amounting to many terabytes of data –
 22 and production of tens of thousands of documents, with document productions still
 23 ongoing.
- 24 • Dozens of subpoenas served to non-party witnesses seeking documents and depositions
 25 (though depositions dates have not yet been scheduled), including a subpoena to a law firm
 26 that has represented both parties in the past.
- 27 • A cumulative total of 108 Interrogatories served among the Parties.
- 28 • A cumulative total of 238 Requests for Production served among the Parties.

Document discovery has spanned a period of time of more than seven years and touches upon almost all aspects of the Parties' business operations. This has resulted in each side reviewing and producing records from document collections that have turned out to be terabytes in size, which is beyond what the parties originally expected at the start of the case. Additionally, the Parties have been preparing for an in-person source code review in Las Vegas.

For their own part, Plaintiffs state here that they were previously unaware of the large number of people who have been employed by Empire, which has increased the expected witness count and led to a number of subpoenas to former employees. The Parties are still coordinating those depositions and otherwise managing the non-party discovery.

The Parties have also engaged in repeated meet and confer sessions and other correspondence over the past several months and have been working diligently to try to resolve their discovery disputes by good faith negotiation rather than motion practice. Depositions have not yet begun pending further completion of document discovery.

In sum, discovery still to be completed includes:

- Completion of document review and production;
- Source code review;
- Coordination with the subpoenaed non-parties, receiving their document productions, and arranging their depositions;
- Noticing and taking of party depositions, including coordination with overseas witnesses;
- Further conferences to resolve any open discovery issues.

C. The Parties' Requested Extension

In view of the Lewis Roca records issue, as well as other pending discovery that the Parties are still working through, the Parties respectfully request a 90-day extension of the case schedule. This is the Parties' first request for an extension. They have been diligently engaged in discovery to-date, and submit that good cause exists supporting the request so as to allow the orderly completion of discovery, as well as sufficient time to try to resolve complex discovery disputes, many of which include matters that were not originally anticipated at the outset of the case. The requested extension is further supported by the Parties' agreement to use the additional time to conduct a private mediation after resolution of document

production issues.

The proposed updated case schedule is shown below.

Event	Current Deadline	Parties' Proposal
Provide initial disclosures under Rule 26(a)	June 14, 2024	[already complete]
Last day to file motion to amend pleadings and add parties absent showing of good cause under Rule 16(b)	November 27, 2024	February 27, 2025
Close of Fact Discovery	February 28, 2025	May 30, 2025
Last day to serve initial expert reports on topics on which the party bears the burden of proof and materials relied upon by experts	March 28, 2025	June 30, 2025
Last day to serve rebuttal experts on topics on which the party does not bear the burden of proof and materials relied upon by rebuttal experts	April 25, 2025	July 28, 2025
Close of Expert Discovery (including expert depositions)	May 23, 2025	August 22, 2025
Deadline to file dispositive motions	June 20, 2025	September 19, 2025
Deadline to file opposition to dispositive motions	July 11, 2025	October 10, 2025
Deadline to file replies to dispositive motions	July 25, 2025	October 24, 2025
Deadline to file Rule 702 (<i>Daubert</i>) motions	August 22, 2025	November 21, 2025
Deadline to file opposition to Rule 702 (<i>Daubert</i>) motions	September 12, 2025	December 12, 2025
Deadline to file replies to Rule 702 (<i>Daubert</i>) motions	September 26, 2025	December 19, 2025
Deadline to file Pretrial Order if no dispositive motions are filed	July 21, 2025	October 20, 2025

IT IS SO STIPULATED.

Dated this 22nd day of November, 2024.

/s/ Jessica M. Lujan

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Dated this 22nd day of November, 2024.

/s/ Ethan Glenn

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Attorneys for Defendants

ORDER

The Court, having reviewed the above stipulation of the parties, and good cause appearing therefor, hereby **GRANTS** the above stipulation and **ADOPTS** the proposed discovery deadlines as set forth herein.

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: November 25, 2024